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Smiths Group plc and Philip Bowman*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X	
SALLY WHITE,	:
	:
Plaintiff,	:
	:
v.	:
	:
SMITHS DETECTION, INC.,	:
SMITHS GROUP, PLC, STEPHEN PHIPSON,	:
PHILIP BOWMAN, CHRISTOPHER GANE,	:
BRIAN BARK and PENNY BOYKO,	:
	:
Defendants.	:
	:
-----X	

Civil Action No. 2:10-cv-04078
ECF Case

DECLARATION OF PHILIP BOWMAN

I, Philip Bowman, declare as follows:

1. I am the Chief Executive Officer of Smiths Group plc, a public limited company organized and existing under the laws of England, United Kingdom, with its principal place of business in London, England, United Kingdom. I make this declaration, on personal knowledge, in support of my motion to dismiss Sally White's lawsuit, as against me.

2. I live and work in London, England, United Kingdom. More specifically, I am a resident of London, and my offices at Smiths Group plc are located in London. I am a citizen of Australia.

3. I am not currently, nor have I ever been, a resident or domiciliary of New Jersey. I have no driver's license or non-driver's identification issued by New Jersey. I have never voted in any election in New Jersey, and I am not, nor have I ever been, registered to vote in New Jersey. I have never paid income taxes or filed a tax return in New Jersey.

4. I do not currently, nor have I ever, owned, rented, leased or managed any real, tangible, intangible or personal property in New Jersey. I do not currently, nor have I ever, maintained or had any interest in any bank, brokerage or investment accounts in New Jersey.

5. I do not currently, nor have I ever, maintained any office, post office box, address or telephone number in New Jersey.

6. I do not currently, nor have I ever, had any agents or designated any agent for service of process in New Jersey.

7. I do not currently, nor have I ever, acted as a director, manager, officer, trustee, employee, agent or in any other capacity on behalf of any company organized under the laws of New Jersey or having its principal place of business in New Jersey.

8. To the best of my recollection, I do not believe that I have traveled to New Jersey for any reason – business or pleasure – since I joined Smiths Group in 2007 (other

than using Newark International Airport in connection with trips to destinations outside New Jersey).

9. I did not supervise Ms. White directly or indirectly. Smiths Group has five separate divisions, of which Smiths Detection is only one. The divisions operate with substantial autonomy, particularly with respect to hiring, managing and supervising employees. The Group companies collectively employ approximately 23,000 employees. I do not, and could not possibly, participate in personnel decisions about each of these employees. Specifically, I played no role in making any personnel decision concerning Ms. White.

10. I do not know Ms. White. Although I recall once being seated at a table with her at dinner during a conference in France and seeing her once at one of the Smiths Detection sites in the United Kingdom (which we were each visiting that day for different purposes), to the best of my recollection, I have never otherwise met or communicated with her. I have confirmed that she sent me an email attaching a copy of her letter of resignation on June 9, 2010. I did not solicit her email, nor did I respond to it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in London, England, United Kingdom on this 14 day of October 2010.


Philip Bowman